

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

USA)	
	Plaintiff)	
v.)	CRIMINAL ACTION
)	CASE NO. 15-10145-RGS
)	
)	
BRANDI WILLIAMS,)	
	Defendant)	

**DEFENDANT BRANDI WILLIAMS PROFFER
IN SUPPORT OF PRETRIAL RELEASE**

NOW COMES Defendant, Brandi Williams, through counsel, and hereby gives notice that her mother, Liana Williams, is willing to post the equity in 12 Westminster Avenue, Roxbury, MA as surety for her appearance and for compliance with any conditions of release. The name, address and phone number of the surety have been provided to Pretrial Services. The current mortgage on the property is approximately \$340,000 and is slightly more than the assessed value of the property. However, Zillow has assessed the resale value of the property to be in excess of \$600,000. This results in surety in excess of \$200,000. Documents supporting these representations will be submitted at a Detention Hearing for the Court's inspection.

The Defendant will reside with her mother and her son at the address posted as surety. Additional conditions of release should include the ability to seek medical attention for a potentially serious condition that the Defendant has recently experienced and to return to her employment when medically cleared.

WHEREFORE, the Defendant requests that the Court order her pretrial release on satisfactory conditions.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "P.C. Horstmann".

Peter Charles Horstmann, Esq.
BBO #556377
450 Lexington Street, Suite 101
Newton, Massachusetts 02461
(617) 723-1980

CERTIFICATE OF SERVICE

I, Peter Charles Horstmann, Esquire, hereby certify that on this 25th day of June, 2015, a copy of the foregoing was electronically served upon Assistant United States Attorney Emily Cummings, Office of the United States Attorney, One Courthouse Way, Boston, Massachusetts, 02210

A handwritten signature in blue ink, appearing to read "P.C. Horstmann".

Peter Charles Horstmann, Esquire